

**From:** Len Shimko [LShimko@crossvalleyfcu.org]  
**Sent:** Monday, April 06, 2009 11:06 AM  
**To:** \_Regulatory Comments  
**Subject:** FW: ANPR on corporate structure

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**From:** Len Shimko  
**Sent:** Monday, April 06, 2009 11:05 AM  
**To:** 'regcomments@ncua.gov.'  
**Subject:** ANPR on corporate structure

I do not believe we need the US Central Corporate CU for the corporates to invest in, when they can invest their excess funds in the Federal Reserve. Also, I do not believe we need as many corporates that we have now. Consolidate them into a more efficient and controllable few, because we do need them to keep the credit union system separate from the banks and also with our settlement services. We use them for our ACH, lines of credit and wire services. Also, I use Midatlantic Corporate for my daily liquidity and cash needs, which frees my employees to do other jobs. They also help us with our Asset/Liability management and regulatory requirements. They are necessity for the small to medium sized credit unions.

Leonard V. Shimko, CEO  
Cross Valley Federal Credit Union